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AND

CLARK COUNTY SCHOOL DISTRICT
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Clark County School District and Board of
Trustees of the Clark County School District

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SARA QUINTANA,

Plaintiff,

vs.

CASE NO. 2:21-cv-00023-CDS-NJK

CLARK COUNTY SCHOOL DISTRICT, a
 political subdivision of the State of Nevada;
 and the BOARD OF TRUSTEES OF THE
 CLARK COUNTY SCHOOL DISTRICT,
 in their official capacities,

Defendants.

STIPULATION AND ORDER
TO EXTEND THE DISPOSITIVE MOTION DEADLINE (45 DAYS)
(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED by Defendants CLARK COUNTY SCHOOL DISTRICT (CCSD) and the BOARD OF TRUSTEES OF THE CLARK COUNTY SCHOOL DISTRICT (BOT) through their attorneys WALTER R. CANNON, ESQ. and STEPHANIE A. BARKER, ESQ. of the law firm of OLSON CANNON GORMLEY & STOBERSKI, and CRYSTAL J. HERRERA, ESQ. of the OFFICE OF THE GENERAL COUNSEL FOR THE CLARK COUNTY SCHOOL DISTRICT; and by Plaintiff SARA QUINTANA through her attorneys JAMES P. KEMP, ESQ. and VICTORIA L. NEAL, ESQ. of the law firm KEMP & KEMP, and JAMES A. HILL, ESQ. of the law firm GILBERT EMPLOYMENT LAW, P.C., that the dispositive motion deadline in this matter be extended for 45 days. This is the parties FIRST post-discovery request for extension of the dispositive motion deadline.

Discovery closed on April 4, 2022. The dispositive Motion deadline is May 4, 2022 (ECF No. 40). The parties have taken five depositions and exchanged hundreds of pages of documentation in the past three months. Plaintiff's final document disclosure was emailed on April 4, 2022. The record is extensive, and in part, was recently disclosed. In reliance on these records, Defendants intend to file a Motion for Summary Judgment. In addition, the parties are exploring the possibility of settlement conference and wish to avoid incurring attorney fees and costs associated with preparing dispositive motions if settlement is a possibility.

Accordingly, the parties hereby stipulate to a 45-day extension of time to submit dispositive motions, moving the deadline from May 4, 2022, to June 17, 2022.

RESPECTFULLY SUBMITTED.

DATED this 28th day of April, 2022.

GILBERT EMPLOYMENT LAW, PC

/s/ *James A. Hill*

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DATED this 28th day of April, 2022.

OLSON CANNON GORMLEY & STOBERSKI

/s/ *Stephanie A. Barker*

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IT IS SO ORDERED.

DATED: April 29, 2022


United States Magistrate Judge

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